

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

FEE STATEMENT COVER SHEET

Debtor: LTL Management LLC Applicant: Parkins & Rubio LLP
Case No.: 23-12825 (MBK) Client: Ad Hoc Committee of Supporting Counsel
Chapter: 11 Case Filed: April 4, 2023

**SECTION I
FEE SUMMARY**

Monthly Fee Statement Covering the Period
May 1, 2023 through May 31, 2023

Total Fees:	\$301,885.00
Total Disbursements:	\$ 604.49
Minus % holdback of Fees:	\$ 60,377.00
Amount Sought at this Time	\$ 242,112.49

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
1. Lenard Parkins, Partner	1976	153.7	\$1,150.00	\$176,755.00
2. Charles Rubio, Partner	2008	161.8	\$775.00	\$121,830.00
3. Gloria Jackson, Paralegal	N/A	10.7	\$200.00	\$2,140.00
4. Jennifer Cook, Paralegal	N/A	5.8	\$200.00	\$1,160.00

SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0	\$0
b) Asset Disposition Sales, leases (section 365 matters), abandonment and related transaction work related to asset disposition.	0	\$0
c) Assumption and Rejection of Leases and Contracts Analysis of leases and executory contracts and preparation of motions specifically to assume or reject.	0	\$0
d) Avoidance Action Analysis Review of potential avoiding actions under Sections 544–549 of the Code to determine whether adversary proceedings are warranted.	0	\$0
e) Budgeting (Case) Preparation, negotiation, and amendment to budgets for applicant.	0	\$0
f) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	\$0
g) Case Administration Coordination and compliance activities not specifically covered by another category.	6.3	\$4,737.50
h) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowances of claims.	0	\$0
i) Corporate Governance and Board Matters Preparation for and attendance at Board of Directors meetings; analysis and advice regarding corporate governance issues, including trustee, examiner, and CRO issues; review and preparation of corporate documents (e.g., articles and bylaws, etc.).	0	\$0
j) Employee Benefits and Pensions Review and preparation related to employee and retiree benefit issues, including compensation, bonuses, severance, insurance benefits, and 401K, pensions, or other retirement plans.	0	\$0
k) Employment and Fee Applications Preparation of employment and fee applications for self or others; motions to establish interim procedures.	9.4	\$2,340.00

l) Employment and Fee Application Objections Review of and objections to the employment and fee applications of others.	0	\$0
m) Litigation Contested Matters and Adversary Proceedings (not otherwise within a specific project category), each identified separately by caption and adversary number, or title of motion or application and docket number, and using the Uniform Task Based Management System (“UTBMS”) Litigation Task Code Set.	117.2	\$111,537.50
n) Meetings and Communications with Creditors Preparation for and attendance at section 341(a) meeting and any other meetings with creditors and creditors’ committees.	6.5	\$6,612.50
o) Non-Working Travel Non-working travel where the court reimburses at less than full hourly rates.	9.2	\$3,565.00
p) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to the allowance and objections to allowance of claims.	183.4	\$173,092.50
q) Real Estate Review and analysis of real estate-related matters, including purchase agreements and lease provisions (e.g., common area maintenance clauses).	0	\$0
r) Relief from Stay and Adequate Protection Matters relating to termination or continuation of automatic stay under 11 U.S.C. 362 and motions for adequate protection under 11 U.S.C. 361.	0	\$0
s) Reporting Statement of financial affairs, schedules, monthly operating reports, and any other accounting or reporting activities; contacts with the United States Trustee not included in other categories.	0	\$0
t) Tax Analysis of tax issues and preparation of federal and state tax returns.	0	\$0
u) Valuation Appraise or review appraisals of assets.	0	\$0
SERVICE TOTALS:	332	\$301,885.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Copies	\$0
b) Outside Printing	\$0
c) Telephone	\$0
d) Facsimile	\$0
e) Online Research	\$0
f) Delivery Services/Couriers	\$0
g) Postage	\$0
h) Local Travel	\$304.49
i) Out-of-town Travel	\$0
j) Out-of-town Travel: Transportation	\$0
k) Out-of-town Travel: Hotel	\$0
l) Out-of-town Travel: Meals	\$0
m) Out-of-town Travel: Ground Transportation	\$0
n) Out-of-town Travel: Other	\$0
o) Meals (local)	\$0
p) Court Fees	\$300.00
q) Subpoena Fees	\$0
r) Witness Fees	\$0
s) Deposition Transcripts	\$0
t) Trial Transcripts	\$0
u) Trial Exhibits	\$0
v) Litigation Support Vendors	\$0
w) Experts	\$0
x) Investigators	\$0
y) Arbitrators/Mediators	\$0
z) Other	\$0
DISBURSEMENTS TOTAL:	\$604.49

I certify under penalty of perjury that the above is true.

Date: July 11, 2023

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

PARKINS & RUBIO LLP

Lenard M. Parkins, Esq.
Charles M. Rubio, Esq.
lparkins@parkinsrubio.com
crubio@parkinsrubio.com
Pennzoil Place
700 Milam St., Suite 1300
Houston, TX 77002
Tel: (713) 715-1666

Ad Hoc Committee of Supporting Counsel

In re:

LTL Management LLC,
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**MONTHLY FEE STATEMENT OF PARKINS & RUBIO LLP,
AD HOC COMMITTEE OF SUPPORTING COUNSEL, FOR THE PERIOD
MAY 1, 2023 THROUGH MAY 31, 2023**

Parkins & Rubio LLP (“P&R”) submits this Monthly Fee Statement (the “Statement”) for services rendered and expenses incurred as Ad Hoc Committee of Supporting Counsel¹ for the period commencing May 1, 2023 and ending May 31, 2023 (the “Statement Period”), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals* [Docket No. 562] (as modified, the “Interim Fee Procedures Order”).

The billing invoices, along with a detailed breakdown of all out-of-pocket disbursements necessarily incurred by P&R for the Statement Period are annexed hereto. These invoices detail

¹ On June 20, 2023, the Bankruptcy Court entered the *Order Authorizing the Debtor to Enter into an Expense Reimbursement Agreement with Ad Hoc Committee of Supporting Counsel* [Docket. 838] that provides for the period of April 18, 2023, through the termination of the Reimbursement Agreement (together, the “Fees and Expenses”).

the services performed by PR.

The fees payment and the expense reimbursement requested in this Statement is as follows:

Fees (100%)	Fee Holdback (20%)	Fee Payment (80%)	Expense Reimbursement (100%)
\$301,885.00	\$60,377.00	\$241,508.00	\$604.49

WHEREFORE, P&R respectfully requests payment of fees for the Statement Period of \$242,112.49 (80% of total fees and 100% of expenses) in accordance with the Interim Fee Procedures Order.

Dated: July 11, 2023

/s/ Charles M. Rubio
PARKINS & RUBIO LLP
Ad Hoc Committee of Supporting Counsel

Summary of Invoices



Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

LTL (AD HOC COMMITTEE OF SUPPORTING COUNSEL)

Invoice	Project Category	Invoice Amount
Invoice #912	Case Administration	\$4,737.50
Invoice #913	Employment and Fee Application	\$2,340.00
Invoice #914	Litigation	\$111,537.50
Invoice #915	Meetings and Communications with Creditors	\$6,612.50
Invoice #916	Non-Working Travel	\$3,565.00
Invoice #917	Plan and Disclosure Statement	\$173,092.50

Fees	\$301,885.00
Less 20%	\$60,377.00
Fee Payment Requested	\$241,508.00
Expense Reimbursement(100%)	\$604.49
Fee Payment Requested Plus Expense Reimbursement	242,112.49

Payment Instructions

Check Payment Information

Remit checks to: Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002

Wire Transfer and Online Payment Information

Bank Name/Address: JPMorgan Chase Bank, N.A.
dba Chase Bank
8 East Pkwy, Scarsdale, NY 10583

Bank ABA/Routing #: ABA Number 021000021 (For international transfers: CHASUS33)

Name/Account #: Parkins & Rubio LLP
Operating Account
Account Number 761958377



Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

INVOICE

P&R Internal Reference # 912
Date: 07/10/2023

LTL (Ad Hoc Committee)

Project Category: Case Administration

Date	Attorney	Description	Quantity	Rate	Total
05/07/2023	LMP	Review correspondence and emails regarding Rule 2019 Statement preparation for filing.	0.70	\$1,150.00	\$805.00
05/08/2023	CMR	Work on form letter to clients describing status of case and the plan support agreement.	0.80	\$775.00	\$620.00
05/09/2023	GJ	Call District Clerks office to make payments for Application for Admission of C. Rubio and L. Parkins to appear Pro Hac Vice.	0.20	\$200.00	\$40.00
05/09/2023	CMR	Work on letter from committee members to client notifying them of case and the plan support agreement.	1.20	\$775.00	\$930.00
05/10/2023	CMR	Continue to work on letter from committee members to client notifying them of case and the plan support agreement.	0.80	\$775.00	\$620.00
05/11/2023	CMR	Continue to work on letter to clients in connection with the member certification (.5); call with M. Murphy regarding same (.3); review transcript regarding same and prepare and send email to L. Parkins regarding same (.3).	1.10	\$775.00	\$852.50
05/11/2023	LMP	Draft insert to lawyer certification for group use on authority and communication with clients.	0.60	\$1,150.00	\$690.00

05/11/2023	GJ	Create contact cards for ad hoc committee of supporting counsel, and circulated the same to the firm group.	0.90	\$200.00	\$180.00
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Quantity Subtotal 6.3

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	1.3	\$1,150.00	\$1,495.00
Charles Rubio	3.9	\$775.00	\$3,022.50
Gloria Jackson	1.1	\$200.00	\$220.00

Quantity Total 6.3

Subtotal \$4,737.50

Total \$4,737.50

Minus 20% Holdback fee in the amount of \$947.50



INVOICE

P&R Internal Reference # 913
Date: 07/10/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

LTL (Ad Hoc Committee)

Project Category: Employment and Fee Applications

Date	Attorney	Description	Quantity	Rate	Total
05/03/2023	GJ	Review and edit April day notes for compliance with U.S. Trustee guidelines.	1.50	\$200.00	\$300.00
05/04/2023	GJ	Review and edit draft April invoices and forward the same to C. Rubio for review.	0.30	\$200.00	\$60.00
05/22/2023	CMR	Prepare comments to motion and proposed order to pay Ad Hoc Committee attorney fees.	0.80	\$775.00	\$620.00
05/26/2023	GJ	Continue to prep and review day notes/invoice for C. Rubio to review.	2.50	\$200.00	\$500.00
05/30/2023	GJ	Continue to prep and review day notes/invoice for C. Rubio to review.	4.30	\$200.00	\$860.00
Quantity Subtotal					9.4

Time Keeper	Quantity	Rate	Total
Charles Rubio	0.8	\$775.00	\$620.00
Gloria Jackson	8.6	\$200.00	\$1,720.00

Quantity Total	9.4
Subtotal	\$2,340.00
Total	\$2,340.00

Minus 20% Holdback Fees in the amount of \$468.00.



INVOICE

P&R Internal Reference # 914
Date: 07/10/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

LTL (Ad Hoc Committee)

Project Category: Litigation

Date	Attorney	Description	Quantity	Rate	Total
05/01/2023	CMR	Review TCC's objection to appointment of R. Ellis and the Debtor's reply in support to determine relevant Ad Hoc Group issues.	1.20	\$775.00	\$930.00
05/01/2023	LMP	Review motions to dismiss filed by TCC, U.S. Trustee, Arnold & Itkin and various mesothelioma claimants (2.2); review TCC letter to Judge Kaplan regarding motion to dismiss scheduling (.7); review Mandamus Petition filed by TCC (2.1); review letter from Jones Day to court in reply to TCC letter on motion to dismiss (.8).	5.80	\$1,150.00	\$6,670.00
05/01/2023	LMP	Review and comment on PH draft of Ad Hoc motion to intervene in adversary and send comments to C. Rubio to review and send on to PH (.5).	0.50	\$1,150.00	\$575.00
05/02/2023	JC	Review docket and gather motions to dismiss for review; forward same to L. Parkins and C. Rubio for review.	0.90	\$200.00	\$180.00
05/02/2023	CMR	Review and make comments to draft motion to intervene in the PI adversary proceeding.	1.10	\$775.00	\$852.50
05/02/2023	LMP	Continue to review mandamus petition of TCC (1.3); calls to discuss mandamus petition with J. Onder (.5) and Kris Hansen on ikie 3rd Cir response (.4).	2.20	\$1,150.00	\$2,530.00

05/02/2023	GJ	Prepare motion to dismiss binders and forward the same to L. Parkins to review.	0.20	\$200.00	\$40.00
05/03/2023	CMR	Attend hearing on motion to appoint Randi Ellis, lift stay motion for Valadez, and scheduling conference from motion to dismiss.	5.60	\$775.00	\$4,340.00
05/03/2023	LMP	Attend hearing for Ad Hoc committee before Judge Kaplan on Randi Ellis appointment and motion to dismiss schedule and discovery issues, and Valdez stay motion conclusion/ ruling (5.6).	5.60	\$1,150.00	\$6,440.00
05/04/2023	CMR	Review and mark up response to the motions to dismiss.	1.20	\$775.00	\$930.00
05/05/2023	CMR	Finalize and circulate to co-counsel and steering committee comments to the omnibus objections to the motions for direct appeal.	0.70	\$775.00	\$542.50
05/07/2023	LMP	Review document request to Ad HOC from TCC and letter response to same from PH (.8).	0.80	\$1,150.00	\$920.00
05/09/2023	LMP	Attend hearings in bankruptcy court by zoom on Ad Hoc Group motion to intervene in Preliminary Injunction adversary proceeding; and on TCC motion to have direct appeal to Third Circuit; ruling on Randi Ellis to be FCR in case.	4.00	\$1,150.00	\$4,600.00
05/09/2023	CMR	Attend hearing on Ad Hoc Committee Motion to Intervene, Motions for Direct Appeal of PI ruling to Third Circuit, FCR ruling, etc.	4.00	\$775.00	\$3,100.00
05/10/2023	CMR	Call with L. Parkins and Ryan Montefusco to discuss objection to motions to dismiss.	0.80	\$775.00	\$620.00
05/10/2023	LMP	Call with C. Rubio and Ryan Montefusco to discuss objection to motions to dismiss.	0.80	\$1,150.00	\$920.00
05/11/2023	CMR	Review TCC motion for standing to bring fraudulent transfer and related claims.	0.50	\$775.00	\$387.50
05/16/2023	CMR	Meeting with steering committee and co-chairs to discuss strategy for hearing (.6); attend omnibus hearing on discovery matters (3.4); follow up call with steering committee and co-chairs (.8).	4.80	\$775.00	\$3,720.00
05/16/2023	LMP	Meeting with steering committee and co-chairs to discuss strategy for hearing (.6); attend court hearing on various plan and disclosure statement hearing schedule and discovery issues, exclusivity; TCC motion to suspend the	4.80	\$1,150.00	\$5,520.00

		case pending MTD ruling; funding agreement discovery, motions to file under seal (3.4); follow up call with steering committee and co-chairs (.8).			
05/18/2023	GJ	Pull verified statement of Paul Hastings LLP, Cole Schotz P.C. and Parkins & Rubio LLP pursuant to bankruptcy rule 2019 by Michael D. Sirota and send the same to L. Parkins for review.	0.30	\$200.00	\$60.00
05/18/2023	CMR	Attend meet and confer on discovery.	0.70	\$775.00	\$542.50
05/18/2023	LMP	Attend meet and confer on discovery.	0.70	\$1,150.00	\$805.00
05/19/2023	LMP	Call among co-counsel to discuss protective order and discovery on motion to dismiss and access to victim information to discuss double-dipping/duping protocol.	1.30	\$1,150.00	\$1,495.00
05/19/2023	CMR	Call among co-counsel to discuss protective order and discovery on motion to dismiss and access to victim information to discuss double-dipping/duping protocol.	1.30	\$775.00	\$1,007.50
05/22/2023	CMR	Calls with L. Parkins regarding revised proposed letter to clients from ad hoc members regarding status of case and negotiations.	0.60	\$775.00	\$465.00
05/22/2023	LMP	Call with C. Rubio regarding revised proposed letter to clients from ad hoc members regarding status of case and negotiations (.3); review and revise proposed letter to clients from Ad Hoc Committee members regarding status of case and negotiations (.5) and follow up call with C. Rubio regarding same (.3).	1.10	\$1,150.00	\$1,265.00
05/23/2023	CMR	Zoom call with B. Hofmeister and others to discuss M. Nachawati's deposition (.6); mark up letter to Judge Kaplan regarding discovery matters, specifically identify of claim holders on the Ad Hoc Committee (.5).	1.10	\$775.00	\$852.50
05/23/2023	LMP	Zoom call with B. Hofmeister and others to discuss M. Nachawati's deposition (.6); Zoom meeting with Paul Hastings lawyers on discovery issues on motion to dismiss (.6); review and revise letter to court in reply to TCC letter on de-duping tort claimants (.5); meeting with Ryan Montefusco of Paul Hastings to discuss upcoming depositions of Ad Hoc committee members by TCC regarding motion to dismiss (1.1).	2.80	\$1,150.00	\$3,220.00
05/24/2023	JC	Gather and assemble motion to dismiss filings from LTL 1 and forward L. Parkins for review.	0.80	\$200.00	\$160.00

05/24/2023	CMR	Attend the deposition of M. Nachawati (4.3), call with M. Nachawati and L. Parkins following deposition to discuss deposition and related matters (1.6), work on comments to objection to motions to dismiss including researching standards under 1112(b) and reviewing the filed motions to dismiss (4.4).	10.30	\$775.00	\$7,982.50
05/24/2023	LMP	Attend the zoom deposition of M. Nachawati (4.3), call with M. Nachawati and C. Rubio following deposition to discuss deposition and related matters (1.6), work on comments to objection to motions to dismiss and reviewing the filed motions to dismiss by TCC and other parties (4.4).	10.30	\$1,150.00	\$11,845.00
05/25/2023	CMR	Work session with L. Parkins to continue to work on comments to objection to motions to dismiss (5.3); work on comments to Onder declaration in support of same (.8); call with R. Montefusco and L. Parkins to discuss objections to motions to dismiss (.4), call with J. Onder to work on his declaration in connection with objection to motion to dismiss (1.0); further revise declaration and portions of the motion (.5); call with Streerco and Co-Counsel to discuss case status and the response to the Motions to Dismiss (.5).	8.50	\$775.00	\$6,587.50
05/25/2023	GJ	Pull Motion for entry of a protective order, forward the same to L. Parkins for review.	0.10	\$200.00	\$20.00
05/25/2023	LMP	Work with C. Rubio on Ad Hoc Objections to Motions to dismiss (5.3) work on Watts' declaration (.5) work J. Onder declaration (1.7); call with R. Montefusco and C. Rubio to discuss objections to motions to dismiss (.4); call with Streerco and Co-Counsel to discuss case status and the response to the Motions to Dismiss (.5).	8.40	\$1,150.00	\$9,660.00
05/26/2023	CMR	Call with J. Onder to work through his declaration in connection with objection to motion to dismiss (1.0); continue to work on Onder's declaration including addressing multiple emails with R. Montefusco regarding same (.8); call with L. Parkins regarding revised proposed letter to clients from ad hoc members regarding status of case and negotiations (.3).	2.10	\$775.00	\$1,627.50
05/26/2023	LMP	Call with C. Rubio regarding revised proposed letter to clients from ad hoc members regarding status of case and negotiations (.3).	0.30	\$1,150.00	\$345.00
05/27/2023	CMR	Call with L. Parkins and J. Onder to discuss status of negotiations and Onder's deposition.	0.50	\$775.00	\$387.50
05/27/2023	LMP	Call with C. Rubio and J. Onder to discuss status of	0.50	\$1,150.00	\$575.00

		negotiations and Onder's deposition.			
05/29/2023	CMR	Call with B. Hofmeister and L. Parkins to discuss J. Onder's deposition and related matters (.3); calls with J. Onder to discuss his deposition and related matters (.3); calls with L. Parkins to discuss J. Onder's deposition and related matters (.3).	0.90	\$775.00	\$697.50
05/29/2023	LMP	Call with B. Hofmeister and C. Rubio to discuss J. Onder's deposition and related matters (.3); Calls with C. Rubio to discuss J. Onder's deposition and related matters (.3).	0.60	\$1,150.00	\$690.00
05/30/2023	GJ	Circulate protective order signed by L. Parkins to msoliman@brownrudnick.com, SSieger-Grimm@brownrudnick.com and L. Parkins via email.	0.10	\$200.00	\$20.00
05/30/2023	CMR	Attend deposition of Jim Murdica (2.2); attend status conference on discovery disputes (1.7); attend deposition of Robert Wuesthoff (partial) (2.5), attend deposition of A. Birchfield (partial) (.6).	7.00	\$775.00	\$5,425.00
05/30/2023	LMP	Attend deposition of Jim Murdica (2.2); attend status conference efore Judge Kaplan regarding multiple discovery disputes issues and duplication issues between TCC, Debtor, Ad Hoc Committee and Johnson & Johnson pending in litigation on Motion to Dismiss Chapter 11 case (1.7); attend deposition of A. Birchfield (1.5).	5.40	\$1,150.00	\$6,210.00
05/31/2023	CMR	Attend deposition of Adam Lisman (partial).	3.00	\$775.00	\$2,325.00
05/31/2023	LMP	Attend deposition of Adam Lisman of Holdco/J&J regarding accounting issues and valuation of new 2023 transactions leading up to new filing for LTL.	3.00	\$1,150.00	\$3,450.00
Quantity Subtotal					117.2

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	58.9	\$1,150.00	\$67,735.00
Charles Rubio	55.9	\$775.00	\$43,322.50
Jennifer Cook	1.7	\$200.00	\$340.00
Gloria Jackson	0.7	\$200.00	\$140.00
Quantity Total			117.2

Subtotal \$111,537.50

Total \$111,537.50

Minus 20% Holdback Fee in the amount of \$22,307.50.



INVOICE

P&R Internal Reference # 915
Date: 07/10/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

LTL (Ad Hoc Committee)

Project Category: Meetings and Communications with Creditors

Date	Attorney	Description	Quantity	Rate	Total
05/02/2023	CMR	Meeting with Ad Hoc Group steering committee and counsel to discuss hearings.	0.80	\$775.00	\$620.00
05/02/2023	LMP	Zoom meeting of Ad Hoc Group and Counsel to discuss strategy for hearings scheduled on May 3, 2023 on FCR, motion to dismiss and motion to intervene in adversary (.8).	0.80	\$1,150.00	\$920.00
05/04/2023	LMP	Call with counsel and member of Ad Hoc Group regarding motion to dismiss planning and related issues (1.1).	1.00	\$1,150.00	\$1,150.00
05/09/2023	LMP	Participate in call of group and counsel to discuss 2019 filing requirements, and urgent need to complete for filing; and discuss strategy for upcoming hearing scheduled for May 9, 2023.	1.40	\$1,150.00	\$1,610.00
05/10/2023	LMP	Participate in zoom meeting of Ad Hoc intervention in adversary and TCC motion for direct appeal to Third Circuit of PI order.	1.00	\$1,150.00	\$1,150.00
05/11/2023	CMR	Attend 341 Meeting (partial).	1.50	\$775.00	\$1,162.50
Quantity Subtotal					6.5

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	4.2	\$1,150.00	\$4,830.00
Charles Rubio	2.3	\$775.00	\$1,782.50
Quantity Total			6.5
Subtotal			\$6,612.50
Total			\$6,612.50

Minus 20% Holdback Fee in the amount of \$1,322.50.



Parkins & Rubio LLP

Attorneys and Counselors at Law

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

INVOICE

P&R Internal Reference # 916
Date: 07/10/2023

LTL (Ad Hoc Committee)

Project Category: Non-Working Travel

Date	Attorney	Description	Quantity	Rate	Total
05/03/2023	CMR	Travel from Scarsdale, NY to Trenton, NJ for hearing on Randi Ellis and scheduling matters (2.4); travel back from hearing (2.4).	4.80	\$387.50	\$1,860.00
05/09/2023	CMR	Travel from Scarsdale, NY (Home) to Trenton, NJ for court hearing (2.2); and travel back (2.2).	4.40	\$387.50	\$1,705.00

Quantity Subtotal 9.2

Time Keeper	Quantity	Rate	Total
Charles Rubio	9.2	\$387.50	\$3,565.00

Quantity Total 9.2

Subtotal \$3,565.00

Total \$3,565.00

Minus Holdback Fee in the amount of \$713.00.



Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

INVOICE

P&R Internal Reference # 917
Date: 07/10/2023
Due On: 08/09/2023

LTL (Ad Hoc Committee)

Project Category: Plan and Disclosure Statement

Date	Time Keeper	Description	Quantity	Rate	Total
05/01/2023	LMP	Two extended calls with J. Onder to discuss TDP and getting approval of same by group and then JJ through Murdica (.7).	0.70	\$1,150.00	\$805.00
05/02/2023	JC	Review and update trust distribution procedure document.	1.40	\$200.00	\$280.00
05/02/2023	GJ	Prepare binders with chapter 11 plan and forward the same to L. Parkins to review (3).	0.30	\$200.00	\$60.00
05/03/2023	JC	Review and update trust distribution document and forward same to C. Rubio for review.	0.80	\$200.00	\$160.00
05/03/2023	LMP	Review comments on TDP and revise review Quigly TDP for example of timing of submission of claim to Trust (.8).	0.80	\$1,150.00	\$920.00
05/04/2023	CMR	Call with co-counsel to review the TDPs (1.1), further revise the TDPs and follow up call with counsel regarding same, calls with J. Onder and M. Nachawati regarding TDPs, circulate TDPs to the Steering Committee (1.7); begin reviewing the Plan draft (1.4).	4.20	\$775.00	\$3,255.00
05/04/2023	LMP	Call with Ad Hoc counsel on TDP comments and revisions for distribution to members for consideration (1.3). start review of draft plan delivered by Jones Day (1.3); Review current draft and revisions to TDP for discussion with steering committee on 5-5-23; draft summary of material open issues for discussion on TDP in preparation for call with steering committee on 5-5-23 (2.2).	4.80	\$1,150.00	\$5,520.00

05/06/2023	LMP	Prepare for (1.1) and participate in call with Steering Committee to discuss current draft of TDP for delivery to JD (.9); call with C. Rubio to discuss disclaimer for AD HOC on TDP to be delivered to JD (.4).	2.60	\$1,150.00	\$2,990.00
05/06/2023	CMR	Prepare for (.6); and attend call with steering committee and co-counsel to review TDP and send out draft TDP to Jones Day (.9), review solicitation procedures motion, and solicitation procedures (2.2).	3.70	\$775.00	\$2,867.50
05/07/2023	LMP	Review Boy Scouts solicitation procedures (1.5); review proposed LTL solicitation procedures for comment and revisions (1.6).	3.10	\$1,150.00	\$3,565.00
05/07/2023	CMR	Review and make comments to solicitation materials and send out to co-counsel.	3.80	\$775.00	\$2,945.00
05/08/2023	CMR	Continue to work on revisions to solicitation materials and calls with L. Parkins regarding same (1.8), calls with L. Parkins regarding Imerys/Cyprus matters (.8); call with L. Parkins and M. Micheli regarding same (.7).	3.30	\$775.00	\$2,557.50
05/08/2023	LMP	Continue to work on revisions to solicitation materials and calls with C. Rubio regarding same (1.8), calls with C. Rubio regarding Imerys/Cyprus matters (.8); call with C. Rubio and M. Micheli regarding same (.7).	3.30	\$1,150.00	\$3,795.00
05/09/2023	LMP	Review plan on issues of Imerys dilutive effect on Trust and issues raise by J. Onder on the substance of the agreement reached with JJ on the Imerys situation; numerous extended calls with J. Onder and M. Micheli on the issue (3.1).	3.10	\$1,150.00	\$3,565.00
05/09/2023	CMR	Begin reviewing draft Disclosure Statement.	1.80	\$775.00	\$1,395.00
05/10/2023	CMR	Prepare for (.8) and attend call with co-counsel and steering committee to discuss TDP and Plan (1.8).	2.60	\$775.00	\$2,015.00
05/10/2023	LMP	Review draft plan in preparation for call the Group members and counsel to discuss plan issues including Imerys situation (2.1); participate in plan discussion call with Group and Counsel (1.8).	3.90	\$1,150.00	\$4,485.00
05/11/2023	CMR	Meeting with D. Peitro and co-counsel to discuss plan and TDP issues (1.4); call with steering committee to review TDP (1.3), call with J. Onder and L. Parkins regarding same (.2).	2.80	\$775.00	\$2,170.00
05/11/2023	LMP	Extended call with D. Pietro of Jones Day, and PH lawyers	3.60	\$1,150.00	\$4,140.00

		to go over plan issues of ad hoc group (1.4); call with steering committee to review TDP (1.3), call with J. Onder and L. Parkins regarding same (.2); draft memo of outstanding plan issues resulting from call with Jones Day (.7).			
05/12/2023	CMR	Detailed analysis of new TDP comparing to the provisions of the ACH TDP.	5.20	\$775.00	\$4,030.00
05/12/2023	LMP	Begin reviewing new Debtor TDP.	2.50	\$1,150.00	\$2,875.00
05/13/2023	CMR	Call with Steerco and co-counsel to discuss plan and TDP (1.0); work on revised draft of the TDP with L. Parkins including addressing comments received from committee members and synthesizing two versions of the TDP together - one created by the AHC and one created by the Debtor (11.2); work on solicitation documents and circulate them to the Steerco and co-counsel (.8).	13.00	\$775.00	\$10,075.00
05/13/2023	LMP	Work on revised draft of the TDP with C. Rubio including addressing comments received from committee members and synthesizing two versions of the TDP together - one created by the Ad Hoc and one created by the Debtor (11.2).	11.20	\$1,150.00	\$12,880.00
05/14/2023	CMR	Calls with J. Onder and L. Parkins to discuss status of TDP and Plan issues (.5); call with Steering Committee, co-counsel and J. Murdica (partial) to discuss TDP and Plan issues (2.1); work on revising the TDP and calls with L. Parkins, J. Onder and M. Nachawati regarding same and send out revised draft to K. Lounsberry (Barnes and Thornburg) (8.2), call with M. Nachawati to discuss status of case (.9).	11.70	\$775.00	\$9,067.50
05/14/2023	LMP	Work on TDP draft with C. Rubio and numerous calls with Onder and Majed on TDP issues.	12.60	\$1,150.00	\$14,490.00
05/15/2023	CMR	Work on responses to Murdica's email regarding TDPs and send to L. Parkins and J. Onder (.8); review J. Onder's comments to Murdica's email and discuss with L. Parkins (.8); call with steering committee and co-counsel to discuss plan issues (1.1); prepare issues list with new version of TDP received from the Debtor and circulate to streerco and co-counsel (5.2); prepare summary of filed TDP and circulate to steering committee and co-counsel (1.6).	9.50	\$775.00	\$7,362.50
05/15/2023	LMP	Call with C. Rubio to discuss TDP issues (.8); call with steering committee and co-counsel to discuss plan issues (1.1); work on responses to Murdica plan issues and TDP	9.40	\$1,150.00	\$10,810.00

		changes; numerous (8.5).			
05/16/2023	CMR	Prepare TDP Issues List and circulate to Matt. Micheli and Matt Murphy.	2.50	\$775.00	\$1,937.50
05/17/2023	LMP	Zoom meeting of Ad Hoc Steering Committee and counsel to discuss plan issues, TDP issues and solicitation document issues (1.7); work on TDP and plan summaries for J. Onder and Majed Nachawati (1.4); extended calls with J. Onder and Majed Nakawati regarding TDP and plan solicitation issues (1.4).	4.50	\$1,150.00	\$5,175.00
05/17/2023	CMR	Zoom meeting of Ad Hoc Steering Committee and counsel to discuss plan issues, TDP issues and solicitation document issues (1.7); work on TDP and plan summaries for J. Onder and Majed Nacawati (1.4) extended calls with J. Onder and Majed Nachawati regarding TDP and plan solicitation issues (1.4).	4.50	\$775.00	\$3,487.50
05/18/2023	JC	Review docket, gather and assemble exclusivity filings; forward same to L. Parkins for review.	1.90	\$200.00	\$380.00
05/19/2023	CMR	Calls with L. Parkins to discuss TDP issues.	0.90	\$775.00	\$697.50
05/19/2023	LMP	Calls with C. Rubio to discuss TDP issues.	0.90	\$1,150.00	\$1,035.00
05/20/2023	LMP	Extended call with Ad Hoc Committe and Counsel regarding TDP, mediation, discovery, and motion to dismiss (1.1); call with C. Rubio to discuss same (.3).	1.40	\$1,150.00	\$1,610.00
05/20/2023	CMR	Extended call with Ad Hoc Committe and Counsel regarding TDP, mediation, discovery, and motion to dismiss (1.1); call with C. Rubio regarding same (.3).	1.40	\$775.00	\$1,085.00
05/21/2023	CMR	Prepare for call with J. Onder and M. Nachawati to discuss outstanding TDP issues (.6); calls with L. Parkins, J. Onder, and Nachawati (1.8).	2.40	\$775.00	\$1,860.00
05/21/2023	LMP	Preparation for call with J. Onder, M. Nachawati and C. Rubio regarding TDP issues to prepare for call on 5-22 with LTL on these issues (.6); participate in such call with Onder and M. Nachawati and C. Rubio regarding TDP (1.8).	2.40	\$1,150.00	\$2,760.00
05/22/2023	CMR	Prepare for TDP meeting with the Debtor (.5); call with Debtor's counsel and ad hoc committee members and co-counsel to review the TDP (2.0), work on revising TDP issues list and send to J. McMillan to incorporate comments (.6), calls with L. Parkins to discuss TDP and plan issues (.9); call with J. Onder to discuss same (.1).	4.10	\$775.00	\$3,177.50

05/22/2023	LMP	Preparation for call with LTL and J&J on TDP (1.3); extended meeting with LTL and J&J, and Ad Hoc Committee counsel to review the TDP (2.0), calls with L. Parkins to discuss TDP and plan issues (.9).	4.20	\$1,150.00	\$4,830.00
05/23/2023	CMR	Multiple calls with L. Parkins to discuss plan and TDP issues (1.5); prepare markups to plan and TDP issues list to send to mediators (1.7).	3.20	\$775.00	\$2,480.00
05/23/2023	LMP	Two calls with J. Onder regarding TDP and Plan issues of Ad Hoc Committee to discuss with mediators; and strategy for meeting (1.8).; multiple calls with C. Rubio to discuss plan and TDP issues (1.5); review and make revisions to issues lists on TDP and Plan of AHOC for delivery to mediators in anticipation of 5-24 mediation session (1.7).	5.00	\$1,150.00	\$5,750.00
05/24/2023	CMR	Attend zoom meeting with mediators (E. Green, G. Russo), the AHC Steering Committee, and AHC co-counsel.	2.50	\$775.00	\$1,937.50
05/24/2023	LMP	Prepare for mediation session with mediators and Ad hoc (.5); participate in meeting with mediators and Ad hoc Group (2.5).	3.00	\$1,150.00	\$3,450.00
05/25/2023	CMR	Follow up with J. Onder and M. Nachawati regarding outstanding TDP issues.	0.30	\$775.00	\$232.50
05/27/2023	CMR	Call with L. Parkins to discuss TDP issues.	1.60	\$775.00	\$1,240.00
05/27/2023	LMP	Call with C. Rubio to discuss TDP issues.	1.60	\$1,150.00	\$1,840.00
05/28/2023	LMP	Call with J. Onder and C. Rubio regarding TDP issues and plan negotiations.	0.80	\$1,150.00	\$920.00
05/28/2023	CMR	Call with J. Onder and L. Parkins regarding TDP issues and plan negotiations.	0.80	\$775.00	\$620.00
05/30/2023	CMR	Call with J. Onder, M. Nachawati and L. Parkins to review TDP issues list.	2.20	\$775.00	\$1,705.00
05/30/2023	LMP	Extended call with J. Onder, M. Nachawati and C. Rubio to go over outstanding TDP issues (2.2).	2.20	\$1,150.00	\$2,530.00
05/31/2023	CMR	Call with Steerco and co-counsel to review TDP issues list (1.5); follow up with J. Mordica in connection with same (.2).	1.70	\$775.00	\$1,317.50
05/31/2023	LMP	Call with Steerco and co-counsel to review TDP issues list (1.5); follow up with J. Mordica in connection with same (.2).	1.70	\$1,150.00	\$1,955.00

Quantity Subtotal 183.4

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	89.3	\$1,150.00	\$102,695.00
Charles Rubio	89.7	\$775.00	\$69,517.50
Jennifer Cook	4.1	\$200.00	\$820.00
Gloria Jackson	0.3	\$200.00	\$60.00

Quantity Total 183.4

Subtotal \$173,092.50

Total \$173,092.50

Please pay within 30 days. Payment Instructions on following page.

Minus 20% Holdback Fee in the amount of \$34,618.50

Payment Instructions

Check Payment Information

Remit checks to: Parkins & Rubio LLP
Attn: Accounts Receivable
700 Milam Street, Suite 1300
Houston, Texas 77002

Wire Transfer and Online Payment Information

Bank Name/Address: JPMorgan Chase Bank, N.A.
dba Chase Bank
8 East Pkwy, Scarsdale, NY 10583

Bank ABA/Routing #: ABA Number 021000021 (For international transfers: CHASUS33)

Name/Account #: Parkins & Rubio LLP
Operating Account Number 761958377

To Pay Via Credit Card or eCheck, please visit: <https://secure.lawpay.com/pages/parkinslee/operating>.

The following fees will apply:

Standard Cards: 1.95% processing + \$0.20 per transaction

Specialty Cards (corporate, rewards): 2.95% processing + \$0.20 per transaction

American Express: 3.5% processing + \$0.20 per transaction

eCheck: 0% processing + \$2.00 flat per transaction

Thank you for your business.



Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
United States
www.parkinsrubio.com

INVOICE

P&R Internal Reference # 919
Date: 07/10/2023
Due On: 08/09/2023

LTL (Ad Hoc Committee)

Project Category: Expenses

Type	Time Keeper	Date	Description	Quantity	Rate	Total
Expense	CMR	05/03/2023	Local Travel: Mileage and tolls to and from Trenton, NJ for hearing = \$160.05; 82.2 miles (going) and 82.6 miles (returning) X 65.5 cents/mile = \$107.94; Tolls: \$52.11	1.00	\$160.05	\$160.05
Expense	LMP	05/09/2023	Other: Application for admission to appear Pro Hac Vice Fee.	1.00	\$150.00	\$150.00
Expense	CMR	05/09/2023	Other: Application for admission to appear Pro Hac Vice Fee.	1.00	\$150.00	\$150.00
Expense	CMR	05/09/2023	Local Travel: Mileage and tolls for trip to and from Trenton, NY Court house for LTL hearing. Mileage 89 miles x 65.5 cents x two ways = \$116.59; tolls = \$27.85.	1.00	\$144.44	\$144.44

Time Keeper	Quantity	Rate	Total
		Subtotal	\$604.49
		Total	\$604.49

Please pay within 30 days. Payment Instructions on following page.

Payment Instructions

Check Payment Information

Remit checks to: Parkins & Rubio LLP
Attn: Accounts Receivable
700 Milam Street, Suite 1300
Houston, Texas 77002

Wire Transfer and Online Payment Information

Bank Name/Address: JPMorgan Chase Bank, N.A.
dba Chase Bank
8 East Pkwy, Scarsdale, NY 10583

Bank ABA/Routing #: ABA Number 021000021 (For international transfers: CHASUS33)

Name/Account #: Parkins & Rubio LLP
Operating Account Number 761958377

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eCheck: 0% processing + \$2.00 flat per transaction

Thank you for your business.